B.2 Corrective Action

MICHIGAN DISPOSAL WASTE TREATMENT PLANT (MDWTP)
MID 000 724 831
2016 PERMIT APPLICATION

FORM EQP 5111 ATTACHMENT TEMPLATE B2
CORRECTIVE ACTION INFORMATION

This document is an attachment to the Michigan Department of Environmental Quality's (DEQ) *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities.* See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) R 299.9504(1)(c), R 299.9508(1)(b), R 299.9525, R 299.9629, R 299.9635, and R 299.9636; §§324.11115a and 324.11115b of Act 451; and Title 40 of the Code of Federal Regulations (CFR) §270.14(d) and Part 264, Subpart F, establish requirements for submitting corrective action information and implementing a corrective action program for hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for corrective action information for the waste management units (WMU) at the *Michigan Disposal Waste Treatment Plant (MDWTP)* facility in *Belleville*, Michigan. This template includes facility background information, current conditions, and release assessment requirements for operating license applications. This template supplies information to support the corrective action program specified in R 299.9629. In this template, applicants must include appropriate justification for the proposed elimination of any WMU from the corrective action program under Part 111 of Act 451.

Ensure that all samples collected for waste characterization and environmental monitoring during corrective action are collected, transported, analyzed, stored, and disposed by trained and qualified individuals in accordance with a QA/QC Plan. The QA/QC Plan should at a minimum include the written procedures outlined in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, Third Edition, Chapter 1 (November 1986), and its Updates.

Applicant for Operating License for Existing Facility:

☒ R 299.9629 Corrective Action

☐ Elimination from corrective action requirements proposed for one or more units

☞ *More than one box may be checked, if one or more WMUs are proposed for elimination from corrective action requirements*

Applicant for Operating License for New, Altered, Enlarged, or Expanded Operating License:

☐ R 299.9629 Corrective Action

☐ Elimination from corrective action requirements proposed for one or more units

Information in this attachment has been provided and approved with other license applications, and attachments of this license application. No new waste management units or areas of concern have been added to the facility.

Table of Contents

B2.M JUSTIFICATION FOR PROPOSED ELIMINATION OF ANY WASTE MANAGEMENT UNIT FROM THE CORRECTIVE ACTION PROGRAM OR INTENT TO PROCEED WITH CORRECTIVE ACTIONS

B2.A FACILITY BACKGROUND

B2.A.1 HISTORY AND DESCRIPTION OF OWNERSHIP AND OPERATION

Information is on file with MDEQ.

B2.A.2 ENVIRONMENTAL SETTING

See Attachment B4

B2.A.2(a) Climate

See Attachment B4

B2.A.2(b) Topography

See Attachment B4 and the map in Attachment B13.

B2.A.2(c) Hydrogeology

See Attachment B3.

B2.A.2(d) Soil

See Attachment B3

B2.A.2(e) Surface Water

See Attachment B3

B2.A.2(f) Surrounding Land Uses

See Attachment B4

B2.A.2(g) Critical Habitats and Endangered Species

See Attachment B4

B2.A.3 CHARACTERIZATION OF POTENTIAL OR ACTUAL SOURCES OF CONTAMINATION

[R 299.9504(c) and 40 CFR §270.14(d)]

This section describes actual or potential sources of contamination at the MDWTP that are subject to the corrective action requirements of Part 111 of Act 451. These sources include WMUs that are discernible units at which contaminants have been placed at any time, or at which contaminants have been released, or at which there is a threat of release regardless of the intended use of such unit. These sources also include areas of concern that are those units which do not meet the definition of WMU, but which may have released contaminants to the environment on a non-routine basis, or which may present an unacceptable risk to public health, safety, welfare, or the environment,

B2.A.3(A) TANKS /CONTAINER STORAGE AREAS/LOADING AND UNLOADING AREAS

B2.A.3(a)(1) Unit Characteristics

See Attachments C1 Containers and C2 Tanks.

B2.A.3(a)(2) Waste Characteristics and Management

See Attachment A2 Chemical and Physical Analyses and A3 Waste Analysis Plan.

B2.A.3(a)(3) History of Releases or Potential to Release

Releases that could pose a threat to human health and the environment have been reported to MDEQ and incident reports have been filed as described in the Attachment A7 Contingency Plan.

B2.B FACILITY'S ASSESSMENT OF KNOWN NATURE AND EXTENT OF CONTAMINATION

B2.B.1 GROUNDWATER

See Attachment B3 Hydrogeological Report.

B2.B.1(A) RECOMMENDATIONS OR ESTABLISHED REQUIREMENTS FOR ADDITIONAL INVESTIGATIONS

No additional investigations are anticipated.

B2.B.2 SOIL

Soil sampling is not performed at MDWTP. See Attachment A5 Environmental Monitoring for waiver information.

B2.B.3 SURFACE WATER AND SEDIMENT

Surface water monitoring is not necessary for the MDWTP for several reasons. First, all runoff within the treatment plant footprint is directed inward to blind sumps where the water is collected and delivered to the wastewater treatment plant. Second, the MWTP is surrounded by land owned by Wayne Disposal, Inc. (WDI). An extensive surface water monitoring program that includes monitoring of surface water runoff from all unpaved areas is conducted per conditions of WDI's Part 111 Operating License. Sampling locations include interior drainage ditches and sedimentation basins. Further, all paved areas that jointly serve truck traffic for MDWTP and WDI operations are curbed and guttered and this water is directed to the wastewater treatment plant for treatment and discharge to the Wayne County sewer system.

B2.B.4 AIR

Ambient air monitoring is completed as described in Attachment B5 Environmental Monitoring. Stack testing is performed in accordance with requirements set forth in the Renewable Operating Permit.

B2.B.4(A) RECOMMENDATIONS OR ESTABLISHED REQUIREMENTS FOR ADDITIONAL INVESTIGATIONS

MDWTP does not anticipate and additional investigations.

B2.C FACILITY'S EXPOSURE ASSESSMENT

There are no environmental impacts on the facility pursuant to Part 201. Therefore no information is available and this section is not applicable.

B2.D INTERIM MEASURES

No information is available.

B2.E ENVIRONMENTAL INDICATORS

See Environmental Indicator forms.

B2.F FACILITY'S ASSESSMENT OF KNOWN OR PROPOSED CONSTITUENTS OF CONCERN

[R 299.9629(3)(a)(i) and (3)(b)(i)]

Not applicable, since no on site contamination currently exists at the facility.

B2.G ESTABLISHED OR PROPOSED CLEANUP CRITERIA

[R 299.9629(3)(a)(ii) and (iii) and R 299.9629(3)(b)(ii) and (iii)]

Not applicable, since no on site contamination currently exists at the facility.

B2.H ESTABLISHED OR PROPOSED COMPLIANCE POINTS AND PERIODS

[R 299.9629(3)(a)(iv) and (v) and R 299.9629(3)(b)(iv) and (v)]

Not applicable, since no on site contamination currently exists at the facility.

B2.I OFF-SITE ACCESS

Not applicable, since no on site contamination currently exists at the facility.

B2.J PUBLIC INVOLVEMENT PLAN

Not applicable, since no on site contamination currently exists at the facility.

B2.K HEALTH AND SAFETY PLAN

Not applicable, since no on site contamination currently exists at the facility.

B2.L NOTICE REQUIREMENTS
[R 299.9525]

Notice would have been filed to the office of register of deeds in Wayne County during the construction of the facility or within 60 days of the rule implementation.

B2.M JUSTIFICATION FOR PROPOSED ELIMINATION OF ANY WASTE MANAGEMENT UNIT FROM THE CORRECTIVE ACTION PROGRAM OR INTENT TO PROCEED WITH CORRECTIVE ACTIONS

No waste management units ate being eliminated from the corrective action program.

ATTACHMENT B2.E.1

ENVIRONMENTAL INDICATOR FORMS

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

DEQ adapted to Word 8/07

RCRA Corrective Action Environmental Indicator (EI) RCRAInfo Code (CA725)
Current Human Exposures Under Control

Facility Name: **Michigan Disposal Waste Treatment Plant**
Facility Address: **49350 North I-94 Service Dr., Belleville, MI 48111**
Facility EPA ID #: **MID 000 724 831**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to Resource Conservation Recovery Act of 1976 (RCRA) Corrective Action (e.g., waste management unit [WMU], regulated unit [RU], and area of concern [AOC]), been **considered** in this EI determination?

   ☒ If yes – check here and continue with #2 below.

   ☐ If no – reevaluate existing data, or

   ☐ If data are not available, skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)
EIs are measures being used by the RCRA Corrective Action Program to go beyond programmatic activity measures (reports received and approved, etc.) to track changes in the quality of the environment. The two EIs developed to date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for nonhuman (ecological) receptors is intended to be developed in the future.

DEFINITION OF "CURRENT HUMAN EXPOSURES UNDER CONTROL" EI
A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA Corrective Action at or from the identified facility [i.e., site-wide]).

Relationship of EI to Final Remedies
While final remedies remain the long-term objective of the RCRA Corrective Action Program the EIs are near-term objectives that are currently being used as program measures for the Government Performance and Results Act of 1993 (GPRA). The "Current Human Exposures Under Control" EIs are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action Program's overall mission to protect human health and the environment requires that final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration/Applicability of EI Determinations
EI determinations status codes should remain in the RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"1** above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from WMUs, RUs or AOCs)?

	Yes	No	?	Rationale/Key Contaminants
Groundwater	☐	☒	☐	
Air (indoors)2	☐	☒	☐	
Surface Soil (e.g., <2ft)	☐	☒	☐	
Surface Water	☐	☒	☐	
Sediment	☐	☒	☐	
Subsurf. Soil (e.g., >2ft)	☐	☒	☐	
Air (outdoors)	☐	☒	☐	

☒ If no (for all media) – skip to #6, and enter "YE", status code after providing or citing appropriate "levels" and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

☐ If yes (for any media) – continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

☐ If unknown (for any media) – skip to #6 and enter "IN" status code.

Rationale and Reference(s):

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

1"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

2Recent evidence (from the Colorado Department of Public Health and Environment, and others) suggests that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above [and adjacent to] groundwater with volatile contaminants) does not present unacceptable risks.

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

Contaminated Media	**Residents**	**Workers**	**Day-Care**	**Construction**	**Trespassers**	**Recreation**	**Food3**
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

A. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.

B. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media – Human Receptor Combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media – Human Receptor combinations (Pathways) do not have check spaces ("__"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

☐ If no (Pathways are not complete for any contaminated media-receptor combination) – skip to #6, and enter "YE" status code, after explaining and/or referencing conditions(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

☐ If yes (Pathways are complete for any "Contaminated" Media – Human Receptor combination) – continue after providing supporting explanation.

☐ If unknown (for any "Contaminated" Media – Human Receptor combination) – skip to #6 and enter "IN" status code.

Rationale and Reference(s)

3Indirect Pathway/Receptor (vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.).

4. Can the **exposures** from any of the complete Pathways identified in #3 be reasonably expected to be **"significant"4** (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: (1) greater in magnitude [intensity, frequency and/or duration] than assumed in the derivation of the acceptable "levels" [used to identify the "contamination"]; or (2) the combination of exposure magnitude [perhaps even though low] and contaminant concentrations [that may be substantially above the acceptable "levels"] could result in greater than acceptable risks)?

   ☐ If no (exposures can not be reasonably expected to be significant [i.e., potentially "unacceptable"] for any complete exposure pathway) – skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant".

   ☐ If yes (exposures could be reasonably expected to be "significant" [i.e., potentially "unacceptable"] for any complete exposure pathway) – continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

   ☐ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

   ☐ If yes (all "significant" exposures have been shown to be within acceptable limits) – continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

   ☐ If no (there are current exposures that can be reasonably expected to be "unacceptable") – continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

   ☐ If unknown (for any potentially "unacceptable" exposure) – continue and enter "IN" status code.

Rationale and Reference(s):

6. Check the appropriate RCRAInfo status codes for the Current Human Exposures Under Control EI Code (CA725), obtain supervisory signature and date on the EI determination below, and attach appropriate supporting documentation as well as a map of the facility.

   ☒ YE – Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected

4If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

to be "Under Control" at the Michigan Disposal Waste Treatment Plant, EPA ID #MID 000 724 831, located at 49350 North I-94 Service Drive, Belleville MI 48111 under current and reasonably expected conditions. This determination will be reevaluated when the agency/state becomes aware of significant changes at the facility.

☐ NO – "Current Human Exposures" are NOT "Under Control."

☐ IN – More information is needed to make a determination.

Completed by: _____ Date: (type date)
(type name)
(type title)
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
517- -

Supervisor: _____ Date: (type date)
(type name)
(type title)
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
517- -

Locations where references may be found:

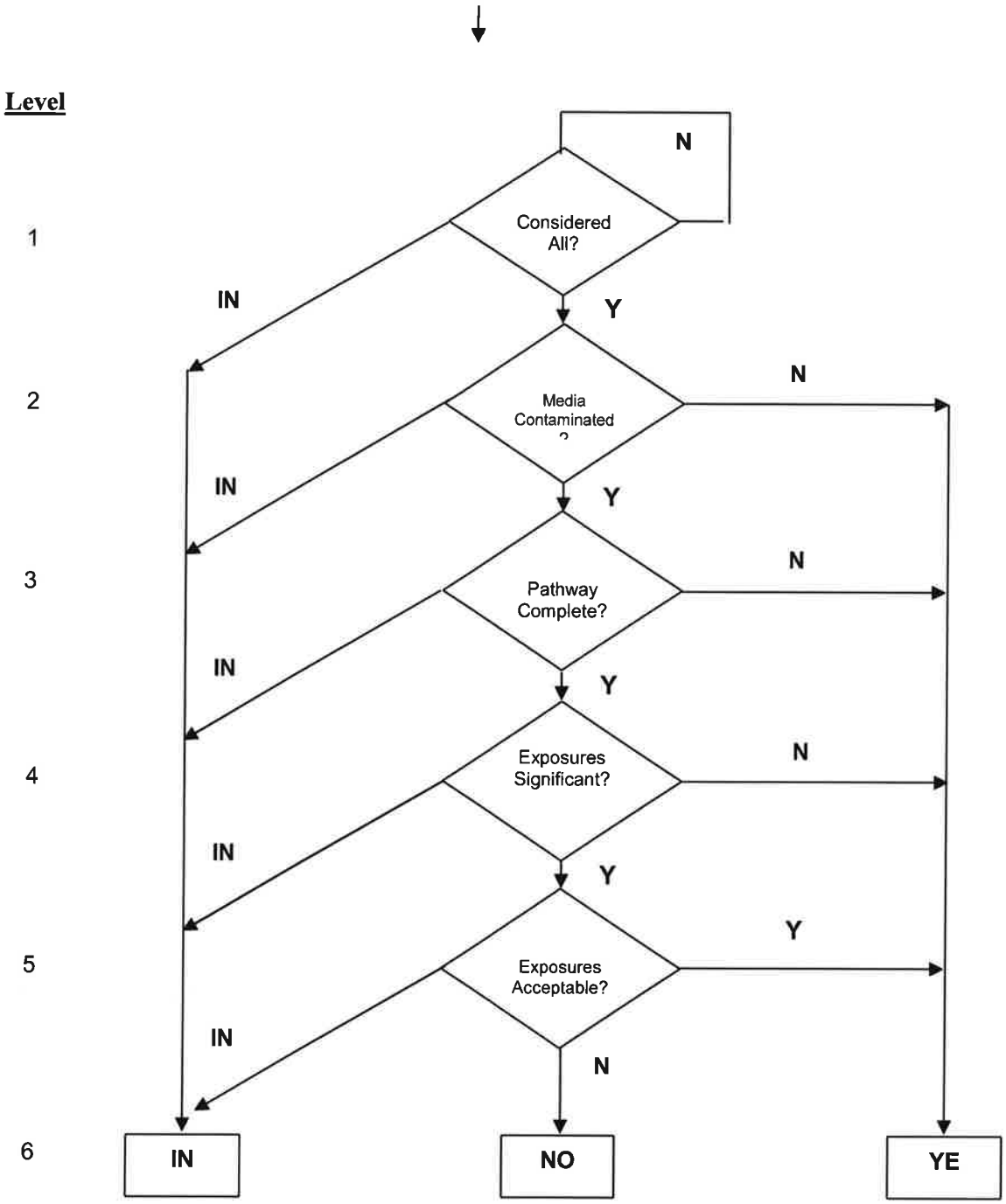
Hazardous Waste Section facility files at:
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
525 West Allegan Street
Lansing, Michigan 48933

Contact e-mail addresses:

(type name) - (type e-mail)
(type name) - (type e-mail)

Final Note: The human exposures EI is a qualitative screening of exposures and the determinations within this document should not be used as the sole basis for restricting the scope of more detailed (e.g., site-specific) assessments of risk.

Facility Name: Michigan Disposal Waste Treatment Plant (MDWTP)
EPA ID#: MID 000 724 831
City/State: Belleville, MI



DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

DEQ adapted to Word 8/07

RCRA Corrective Action Environmental Indicator (EI) RCRAInfo Code (CA750)
Migration of Contaminated Groundwater Under Control

Facility Name: **Michigan Disposal Waste Treatment Plant (MDWTP)**
Facility Address: **49350 North I-94 Service Drive., Belleville, MI 48111**
Facility EPA ID #: **MID 000 724 831**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from waste management units (WMU), regulated units (RU), and areas of concern (AOC)), been **considered** in this EI determination?

   ☒ If yes - check here and continue with #2 below.

   ☐ If no - reevaluate existing data, or

   ☐ If data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)
EIs are measures being used by the RCRA Corrective Action Program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EIs developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for nonhuman (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI
A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA Corrective Action at or from the identified facility [i.e., site-wide]).

Relationship of EI to Final Remedies
While final remedies remain the long-term objective of the RCRA Corrective Action Program the EIs are near-term objectives that are currently being used as program measures for the Government Performance and Results Act of 1993, (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated groundwater and contaminants within groundwater (e.g., nonaqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration/Applicability of EI Determinations
EI determinations status codes should remain in the RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

   ☐ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

   ☒ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

   ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"[2] as defined by the monitoring locations designated at the time of this determination)?

   ☐ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"[2].

   ☐ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"[2]) – skip to #8 and enter "NO" status code, after providing an explanation.

   ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

   ☐ If yes - continue after identifying potentially affected surface water bodies.

   ☐ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation

and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration[3] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions [e.g., the nature, and number, of discharging contaminants, or environmental setting], that significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

   ☐ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: (1) the maximum known or reasonably suspected concentration[3] of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and (2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

   ☐ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: (1) the maximum known or reasonably suspected concentration[3] of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and (2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

   ☐ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[4])?

   ☐ If yes - continue after either: (1) identifying the final remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water,

sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR (2) providing or referencing an interim-assessment,[5] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors that should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

☐ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

☐ If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):

7. Will groundwater **monitoring**/measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

   ☐ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

   ☐ If no - enter "NO" status code in #8.

   ☐ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

8. Check the appropriate RCRAInfo status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), obtain supervisor signature and date on the EI determination below, and (attach appropriate supporting documentation as well as a map of the facility.

   ☒ YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a

review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Michigan Disposal Waste Treatment Plant, EPA ID # MID 000 724 831, located at 49350 North I-94 Service Drive, Belleville, MI 48111. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater." This determination will be reevaluated when the agency/state becomes aware of significant changes at the facility.

☐ NO - Unacceptable migration of contaminated groundwater is observed or expected.

☐ IN - More information is needed to make a determination.

Completed by: _____ Date (type date)
(type name)
(type title)
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
517- -

Supervisor: _____ Date (type date)
(type name)
(type title)
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality

Locations where references may be found:
Hazardous Waste Section facility files at:
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
525 West Allegan Street
Lansing, Michigan 48933

Contact e-mail addresses:
(type name) - (type e-mail)
(type name) - (type e-mail)

Facility Name: Michigan Disposal Waste Treatment Plant (MDWTP)
EPA ID#: MID 000 724 831
City/State: Belleville, MI

MIGRATION OF CONTAMINATED GROUNDWATER UNDER CONTROL (CA 750)